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BY ECF

The Honorable William F. Kuntz, II
United States District Judge
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: *United States v. Gorgi Naumovski*, Docket No. 20 Cr. 384 (WFK)
Gorgi Naumovski's Supplemental Sentencing Submission

Dear Judge Kuntz:

On behalf of our client, Gorgi Naumovski, I respectfully provide this supplemental sentencing submission to address the government's stated concern that Mr. Naumovski may reoffend "if [he] sees the opportunity," particularly in light of his role in the cannabis industry. Dkt. 138 at 4-5. As detailed in our initial sentencing memorandum and the letters that were attached thereto, Mr. Naumovski has demonstrated genuine remorse, fully recognizes the gravity of his actions, and is already deterred by this prosecution and the significant collateral consequences that will result.

Nothing about Mr. Naumovski's longstanding participation in the cannabis industry suggests he presents a greater risk of recidivism than any other defendant. In fact, his conduct in that industry—as detailed in the letter from Mary Keen, a Drug Compliance Investigator with the Illinois Department of Financial and Professional Regulations who inspects dispensaries run by Mr. Naumovski on a quarterly basis—has been exemplary. *See* Letter of Mary Keen, attached hereto as Exhibit A.¹ In her letter, Ms. Keen confirms that Mr. Naumovski consistently meets the State's exacting standards, fosters a compliant and supportive environment for his employees, and has demonstrated honesty and transparency in all of his regulatory dealings. *Id.*

Under these circumstances, there is no showing of any risk of further misconduct. For this reason and the other reasons cited in our initial sentencing submission, we submit—and the government has agreed—that a sentence of probation is appropriate.

We appreciate Your Honor's attention and consideration.

¹ Ms. Keen's letter was also attached to Mr. Naumovski's initial sentencing submission as Exhibit 18. *See* Dkt. 136-18.

Respectfully submitted,

Maksim Nemtsev
Timothy Flaherty

CC: Miriam Glaser Dauermann, U.S. Department of Justice (by ECF and Email)
Patrick. J. Campbell, U.S. Department of Justice (by ECF and Email)
Jeremy J. Toner, U.S. Probation Officer (by Email)